

Carolyn H. Cottrell (SBN 166977)
ccottrell@schneiderwallace.com
Ori Edelstein (SBN 268145)
oedelstein@schneiderwallace.com
Eugene Zinovyev (SBN 267245)
ezinovyev@schneiderwallace.com
SCHNEIDER WALLACE
COTTRELL KONECKY LLP
2000 Powell Street, Suite 1400
Emeryville, CA 94608
Telephone: (415) 421-7100
Facsimile: (415) 421-7105

Attorneys for Plaintiffs
HA NGUYEN, ALEX BHAGATRAM,
ALICIA TAYLOR, SORAYA LODIN,
TEYANI CISNEROS, and MICHAEL WEBSTER
and the Class and Collective

[defense counsel on next page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

HA NGUYEN, ALEX BHAGATRAM,
ALICIA TAYLOR, SORAYA LODIN,
TEYANI CISNEROS, and
MICHAEL WEBSTER, individuals,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

BLOOMINGDALE'S, LLC; MACY'S, INC.;
and DOES 1 through 100, inclusive,

Defendants.

Case No. 4:23-cv-00768-YGR

**STIPULATION TO EXTEND TIME
TO FILE RESPONSE TO CLASS AND
COLLECTIVE ACTION COMPLAINT**

[L.R. 6-1(a)]

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1 Cary G. Palmer (SBN 186601)
cary.palmer@jacksonlewis.com
2 Erika M. Barbara (SBN 215702)
erika.barbara@jacksonlewis.com
3 Keelia K. Lee (SBN 346549)
keelia.lee@jacksonlewis.com
4 JACKSON LEWIS P.C.
400 Capitol Mall, Suite 1600
5 Sacramento, CA 95814
Telephone: (916) 341-0404
6 Facsimile: (916) 341-0141

7 Philip J. Smith (SBN 232462)
philip.smith@jacksonlewis.com
8 Chelsea A. Whelan (SBN 282993)
chelsea.whelan@jacksonlewis.com
9 JACKSON LEWIS P.C.
50 California Street, 9th Floor
10 San Francisco, CA 94111
Telephone: (415) 394-9400
11 Facsimile: (415) 394-9401

12 Michael C. Christman (SBN 319758)
michael.christman@macys.com
13 MACY'S LAW DEPARTMENT
11477 Olde Cabin Road, Suite 400
14 St. Louis, MO 63141
Telephone: (314) 342-6334

15 Attorneys for Defendants
16 BLOOMINGDALE'S, LLC and MACY'S, INC.
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**STIPULATION TO EXTEND TIME TO FILE RESPONSE TO
CLASS AND COLLECTIVE ACTION COMPLAINT**

TO THE HONORABLE COURT:

WHEREAS, Plaintiffs Ha Nguyen, Alex Bhagatram, Alicia Taylor, Soraya Lodin, Teyani Cisneros, and Michael Webster (“Plaintiffs”) filed their Class and Collective Action Complaint (“Complaint”) on February 21, 2023 [Dkt. 1], and served their Complaint on Defendants Bloomingdale’s, LLC and Macy’s, Inc. (“Defendants”) on February 27, 2023 [Dkt. 9, 10];

WHEREAS, the Parties agreed to one prior extension of Defendants’ responsive pleading deadline [Dkt. 12];

WHEREAS, Defendants’ response to Plaintiffs’ Complaint is currently due on April 10, 2023; and

WHEREAS, the extension will not alter the date of any event or any deadline already fixed by Court order;

NOW, THEREFORE, IT IS HEREBY STIPULATED, pursuant to Local Rule 6-1(a), by and between the Parties, through their undersigned counsel, that Defendants shall have an extension of time up to and including May 1, 2023, to file a response to Plaintiffs’ Complaint.

Respectfully submitted,

Dated: April 5, 2023

SCHNEIDER WALLACE
COTTRELL KONECKY LLP

By: /s/ Eugene Zinovyev

Carolyn H. Cottrell
Ori Edelstein
Eugene Zinovyev

Attorneys for Plaintiffs HA NGUYEN,
ALEX BHAGATRAM, ALICIA TAYLOR,
SORAYA LODIN, TEYANI CISNEROS,
and MICHAEL WEBSTER and the Class
and Collective

1 Dated: April 5, 2023

JACKSON LEWIS P.C.

2 By: /s/ Erika M. Barbara

3 Cary G. Palmer

Erika M. Barbara

4 Philip J. Smith

Attorneys for Defendants

5 BLOOMINGDALE'S, LLC and

6 MACY'S, INC.

7 **SIGNATURE ATTESTATION**

8 I hereby attest that all signatories listed above, on whose behalf this stipulation is submitted,
9 concur in the filing's content and have authorized the filing.

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11 Dated: April 5, 2023

/s/ Erika M. Barbara

12 Erika M. Barbara